

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., *et al.*,

Post-Effective Date Debtors.<sup>1</sup>

)  
) Chapter 11  
)  
) Case No. 25-10068 (CTG)  
)  
) (Jointly Administered)  
)  
) Re: D.I. \_\_\_\_

**ORDER SUSTAINING GUC TRUST’S THIRD OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CERTAIN CLAIMS (LATE FILED CLAIMS)**

Upon consideration of the *GUC Trust’s Third Omnibus Objection (Non-substantive) to Certain Claims (Late Filed Claims)* (the “Objection”)<sup>2</sup> filed by the GUC Trust for entry of an order (this “Order”) pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007–1, disallowing the claims listed on **Schedule 1** to this Order (the “Late Filed Claims”), all as more fully set forth in the Objection; and the Court having reviewed the Balasiano Declaration in support of the Objection; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that notice of the Objection

<sup>1</sup> The Post-Effective Date Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

<sup>2</sup> Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Objection.

and of the hearing on the Objection was sufficient under the circumstances and in full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. Each Late Filed Claim identified on **Schedule 1** attached hereto is hereby disallowed.
4. The Claims and Noticing Agent is authorized to update the Claims Register to reflect the relief granted in this Order.
5. Each of the Late Filed Claims and the objections by the GUC Trust to such Late Filed Claims, as addressed in the Objection and set forth on **Schedule 1** attached to this Order, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each of the Late Filed Claims. Any stay of this Order shall apply only to the contested matter that involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.
6. Nothing in this Order shall be deemed (i) an admission as to the validity of any claim or interest against the Debtors or the GUC Trust; (ii) a waiver of the GUC Trust's or any other party's rights to dispute or otherwise to object to any claim or proof of interest on any grounds or basis; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any claim is of a type referenced or defined in the Objection; (v) a waiver or limitation of any of the GUC Trust's rights under the Bankruptcy Code or applicable law, or (vi) to waive or release any

right, claim, defense, or counterclaim of the GUC Trust, or to estop the GUC Trust from asserting, any right, claim, defense, or counterclaim (including setoff).

7. The GUC Trust and the Claims and Noticing Agent are authorized to take all actions necessary to effectuate the relief granted in this Order.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**Schedule 1**

**Schedule 1****Late Filed Claims**

Basis for Objection: See Paragraphs 17 - 22 of the foregoing Objection

#	Name	Claim No.	Debtor	Date Filed	Asserted Claim Amount	Asserted Claim Priority	Adjusted Amount	Basis for objection
1	A.W. FABER-CASTELL USA INC	13220	JOANN Inc.	04/11/2025	\$126,275.56	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
2	Acacia-Tucson LLC	18099	Jo-Ann Stores, LLC	05/29/2025	\$314,502.70	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
3	Aurient International Corp.	13913	JOANN Inc.	04/18/2025	\$501,581.13	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
4	Bazaarvoice, Inc.	14822	Jo-Ann Stores, LLC	04/25/2025	\$34,359.07	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
5	Blue Yonder, Inc.	19621	Jo-Ann Stores, LLC	07/24/2025	\$955,024.51	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
6	Brink's Inc.	15764	Jo-Ann Stores, LLC	05/01/2025	\$211,941.96	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
7	Candle Warmers Etc	16270	JOANN Inc.	05/08/2025	\$44,153.85	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
8	COMPLETE CONSTRUCTION COMMERCIAL SERVICES	12409	Jo-Ann Stores, LLC	04/07/2025	\$64,392.93	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
9	CONNER, CHRISTINE AND JAMES	14611	Jo-Ann Stores, LLC	04/14/2025	\$225,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
10	Decorware Inc.	18112	Jo-Ann Stores, LLC	05/30/2025	\$149,632.76	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
11	Dickinson Wright PLLC	16400	Jo-Ann Stores, LLC	05/09/2025	\$86,002.70	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
12	Edge Logistics, LLC	12517	JOANN Inc.	04/09/2025	\$65,875.74	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
13	ENGIE Insight Services Inc. dba ENGIE Impact	15932	Jo-Ann Stores, LLC	05/02/2025	\$27,901.07	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
14	Estrada, Deanna	13541	JOANN Inc.	04/15/2025	\$1,000,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
15	EQYInvest Owner II, Ltd.	17866	Jo-Ann Stores, LLC	05/27/2025	\$153,123.51	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
16	Euler Hermes agent for M & Y TRADING CORP.	14449	JOANN Inc.	04/22/2025	\$20,949.26	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.

17	FedEx Corporate Services Inc.	19377	Jo-Ann Stores, LLC	07/14/2025	\$6,297,644.19	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
18	Fletcher Hills Town and Country Shopping Center, LP	19550	Jo-Ann Stores, LLC	07/22/2025	\$838,389.32	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
19	FREEDOMPAY INC	14252	Jo-Ann Stores, LLC	04/17/2025	\$206,959.69	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
20	G.A. Export (Thailand) Co., Ltd	13283	JOANN Inc.	04/11/2025	\$364,908.41	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
21	Gladly Software, Inc.	19616	JOANN Inc.	07/24/2025	\$32,519.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
22	Glaus, Pyle, Schomer, Burns & DeHaven, Inc. dba GPD Group	15759	JOANN Inc.	05/01/2025	\$34,246.42	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
23	HERO ARTS RUBBER STAMPS INC	12400	JOANN Inc.	04/07/2025	\$152,090.16	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
24	Hongkong Simple Element Global Limid	17581	JOANN Inc.	05/20/2025	\$4,167,670.17	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
25	Jackson Lewis P.C.	15128	JOANN Inc.	04/21/2025	\$21,947.89	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
26	JobsOhio	17352	Jo-Ann Stores, LLC	05/20/2025	\$800,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
27	Kilkenny, Lynn	19742	Jo-Ann Stores, LLC	07/25/2025	\$242,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
28	Kilkenny, Lynn	19754	Jo-Ann Stores, LLC	07/28/2025	\$242,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
29	Mann, Donna Lynn	18423	Jo-Ann Stores, LLC	06/06/2025	\$27,200.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
30	Moody's Investors Service, Inc.	15860	Jo-Ann Stores, LLC	05/05/2025	\$67,667.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
31	Neo Casta International	12631	Jo-Ann Stores, LLC	04/10/2025	\$179,531.36	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
32	Niki Auburn Mile, LP, Samex Properties, LLC, Sunray Property Investments, LLC	19604	Jo-Ann Stores, LLC	07/24/2025	\$172,990.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
33	NNN Yulee FL Owner LP	19759	Jo-Ann Stores, LLC	07/31/2025	\$318,739.58	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
34	Omni Systems Inc	13284	JOANN Inc.	04/11/2025	\$41,805.76	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
35	PG&E	12412	Jo-Ann Stores, LLC	04/07/2025	\$67,745.54	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.

36	Plaid Enterprises, Inc.	19311	JOANN Inc.	07/10/2025	\$110,702.91	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
37	Qiu, Fengmin	18638	Jo-Ann Stores, LLC	06/06/2025	\$986,182.57	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
38	Remedy Intelligent Staffing	16227	Jo-Ann Stores, LLC	05/07/2025	\$388,239.40	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
39	Ruisi, Anna	19602	JOANN Inc.	07/24/2025	\$1,000,000.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
40	Seasons Tex	12408	JOANN Inc.	04/08/2025	\$90,633.62	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
41	Shaoxing Enyi Textile Co., Ltd.	7757	Jo-Ann Stores, LLC	04/28/2025	\$1,556,037.60	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
42	SPARTAN GRAPHICS INC	18667	JOANN Inc.	06/17/2025	\$33,343.15	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
43	SPARTAN GRAPHICS INC	18679	JOANN Inc.	06/17/2025	\$22,011.47	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
44	Stoetzer, Andrea M	19054	JOANN Inc.	06/30/2025	\$31,630.06	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.
45	The Marketplace Tavares, LLC	18931	Jo-Ann Stores, LLC	06/19/2025	\$458,244.00	General Unsecured	\$0.00	Claim was filed after the applicable Bar Date.